

**RICHARD H. ROSENBERG**  
ATTORNEY AT LAW

217 BROADWAY  
SUITE 707  
NEW YORK, NEW YORK 10007

TEL: 212-586-3838  
FAX: 212-962-5037  
richrosenbergesq@gmail.com

March 13, 2025

Granted.  
So ordered.  
3/13/2025

Hon. J. Paul Oetken  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, New York 10007

  
J. PAUL OETKEN  
United States District Judge

**Re: United States v. Rafael Alvarez**  
**24 Cr. 221 (JPO)**

Your Honor:

Along with Michael K. Bachrach, Esq. I represent Rafael Alvarez in the above-captioned matter and write today for a modification of the defendant's bond so as to allow travel to franchise events taking place in Plano, Texas on March 21, 2025 and in Las Vegas, Nevada on March 25, 2025.

Mr. Alvarez ( along with other family members) also wishes to visit with his daughter at the University of Pittsburgh for a campus family celebration on March 23, 2025.

These events will encompass a departure on March 20, 2025 with a final return on March 30, 2025. No other modification of Mr. Alvarez' bail conditions are sought.

Pretrial Officer Andrew Abbott, who has been provided full itinerary details of the proposed travels including hotel arrangements, has no objection to the travel requests. The United States Attorney's Office per A.U.S.A. David Felton deferred to Pretrial.

Defendant Alvarez' current bail conditions include a \$600,000.00 appearance bond co-signed by four financially responsible individuals and secured by real property located in Cortland Manor, New York. His travel is restricted to the Southern and Eastern Districts of New York. He is also required to seek and maintain employment.

Thank you for your consideration and continued courtesies to counsel.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Richard H. Rosenberg", with a long horizontal line extending to the right.

Richard H. Rosenberg  
Michael K. Bachrach

cc.: Pretrial Officer Abbott, A.U.S.A. Felton